

# Acupuncture and Oriental Medicine Alliance

*Ancient wisdom, new awareness, awakening American medicine*

---

## **Board of Directors**

### **Executive Committee**

#### *President*

Carla Wilson, L.Ac., Dipl.Ac. & C.H. (NCCAOM)  
Los Angeles, CA

#### *Secretary*

Floyd Herdrich, L.Ac., Dipl.Ac. & ABT (NCCAOM)  
Fairfax Station, VA

#### *Treasurer*

Stanley Leung, L.Ac.  
San Francisco, CA

#### *Past President*

James Blair, L.Ac., Dipl.Ac. (NCCAOM)  
Seattle, WA

#### *Member-at-Large*

Thomas R. Haines, Ph.D.  
San Diego, CA

## **Directors**

Sherman L. Cohn, J.D.  
Washington, D.C.

Chris Huson, L.Ac., Dipl.Ac. (NCCAOM)  
Seattle, WA

Rachel Toomim, L.Ac.  
Sarasota, FL

James S. Turner, J.D.  
Washington, D.C.

Regina Walsh, M.Ac., L.Ac., Dipl.Ac. (NCCAOM)  
Katonah, NY

## **National Office**

---

14637 Starr Road S.E.  
Olalla, WA 98359  
Telephone (253) 851-6896  
Fax: (253) 851-6883

[www.AcupunctureAlliance.org](http://www.AcupunctureAlliance.org)

Tierney Tully, M.S.O.M., Dipl.Ac. (NCCAOM)  
*Executive Director*

An alliance of individuals and organizations  
who use acupuncture and Oriental medicine  
principles in their work and lives.

March 5, 2002

Dr. Linda Smallwood, Ph.D.  
Center for Biological Evaluation & Research  
Food & Drug Administration  
1401 Rockville Pike  
Mailing Code HFM302  
Rockville, MD 20852

Re: Safety Record of Acupuncture

Dear Dr. Smallwood,

I am writing on behalf of the Acupuncture and Oriental Medicine Alliance, a 501(c)(4) nonprofit professional membership organization of over 1,450 practitioners, consumers, students, colleges, vendors and other health care providers across the U.S. who support acupuncture and Oriental medicine based on standards of competency. We are concerned about the question on blood donor forms which asks potential blood donors if they have had acupuncture, and, the practice of automatically deferring those potential donors who respond affirmatively from donating for twelve months. Our chief concern is that the question implies that receiving treatment from a licensed acupuncturist places a patient at risk for transmission of blood borne pathogens. This is incorrect and damaging to our profession. Also, as the use of acupuncture by the American public spreads, the practice of deferring removes an increasing number of potential blood donors from the donor pool unnecessarily.

Acupuncture and Oriental medicine has been one of the fastest growing professions in the history of the United States. Forty-two states plus the District of Columbia have passed statutes or regulations establishing standards of competency for licensure of acupuncture and Oriental medicine providers. Four others have introduced legislation. One of the reasons for this rapid acceptance has been the remarkable safety record of our practitioners. In the early 1980's when the national organizations were formed, the community identified clean needle technique as a top priority. The National Certification Commission for Acupuncture and Oriental Medicine (NCCAOM) developed the *Clean Needle Technique Manual*, which was reviewed by the Centers for Disease Control, and mandated that every national board certified individual pass an approved clean needle technique (CNT) course. The course emphasizes prevention of transmission of blood borne pathogens and other safety aspects of acupuncture. This requirement still exists. The Council of Colleges of Acupuncture and Oriental Medicine administers the CNT Course in over thirty locations across the U.S. The fourth edition of the *Manual* incorporates OSHA information and recently developed procedures. A 5<sup>th</sup> edition is in process.

As a result, communication of disease through acupuncture has not been an issue in the U.S., a record few other health care professions can claim. There is no known transmission of AIDS through acupuncture and, according to the National Acupuncture Foundation's memo on the *Safety Record of Acupuncture* (enclosed), only one documented incidence of transmission of hepatitis by an individual licensed without examination or education in national clean needle technique over twelve years ago. In over seventeen years of national board certification, the NCCAOM has received no complaint of transmission of disease through acupuncture, nor to our knowledge has any state board. It is also noteworthy that there are very few complaints of unlicensed practice. Please see the attached copies of letters from the medical boards and departments of health/education in Oregon, Massachusetts, Wisconsin, Minnesota, Rhode Island, Washington, Montana, Pennsylvania and New York that oversee acupuncture. These letters were presented to the legislature when this issue arose during the passage of the initial bill in Ohio.

# *Acupuncture and Oriental Medicine Alliance*

---

*Ancient wisdom, new awareness, awakening American medicine*

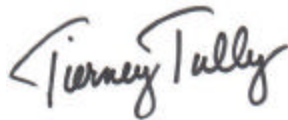
The rapid acceptance and safety record of acupuncture has also been due to the excellent standards of education and certification established by the profession. There are over forty-five accredited and candidate colleges of acupuncture and Oriental medicine recognized by the Accreditation Commission for Acupuncture and Oriental Medicine (ACAOM). ACAOM is recognized by the United States Department of Education and is a member of the Council on Postsecondary Accreditation. ACAOM accredits three-year masters level programs in acupuncture and four-year masters level programs in Oriental medicine (acupuncture and Chinese herbology.) ACAOM-approved programs train individuals to be independent providers of acupuncture and Oriental medicine. Clean needle technique is stressed throughout the didactic and clinical education.

These standards of education are coupled with passage of an excellent national certification process by the NCCAOM. The NCCAOM examination in acupuncture contains questions on clean needle technique as well as acupuncture and Oriental medical theory, diagnosis and treatment. All but three of the states that have passed statutes use the NCCAOM in their licensure process.

The use of excellent national standards in the U.S. and the emphasis on clean needle technique have created an outstanding safety record for our profession. We ask that you support the removal of acupuncture from the blood donor questionnaire where it's categorization with non-medical activities such as tattooing and ear and skin piercing discredits our profession and may discourage consumers from seeking qualified acupuncture services.

Thank you for your consideration of our request. If you need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in dark ink, reading "Tierney Tully". The signature is written in a cursive, flowing style.

Tierney Tully, M.S.O.M., Dipl.Ac.(NCCAOM)  
Executive  
Director

Enclosures: Laws Book, CNT manual, Safety Record, Alliance brochures